

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF
THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION

This document relates to: 18-cv-04892.

MASTER DOCKET

18-md-2865 (LAK)

STIPULATION AND [PROPOSED] ORDER OF VOLUNTARY DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Skatteforvaltningen (“SKAT”) and Defendants The MPQ Holdings LLC 401K Plan (“MPQ Plan”) and Mitchell Protass (“Protass”) hereby stipulate and agree that SKAT’s action against Defendants MPQ Plan and Protass, captioned *Skatteforvaltningen v. The MPQ Holdings LLC 401K Plan, et al.*, No. 18-cv-04892, which is part of these consolidated proceedings, is hereby voluntarily dismissed by SKAT, without prejudice, with each party bearing its own costs and attorneys’ fees.

Dated: New York, New York
December 4, 2023

By: /s/ Marc A. Weinstein
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and Mitchell Protass*

SO ORDERED:

Lewis A. Kaplan
United States District Judge